

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: § **CHAPTER 7**
WITH PURPOSE, INC. § **CASE NO. 23-30246-mvl7**
Debtor. §

**SEVEN TALENTS, LLC, RHYTHMIC
CAPITAL FUND II, LLC, AND J.I.G., LLC,** §
§
§
§
§
§
Plaintiffs, §
v. §
**TOBY NEUGEBAUER and BANZAI
ADVISORY GROUP, LLC,** §
Defendants. §
ADV. NO. 23-03032-mvl

**PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR THE HEARING ON PLAINTIFFS'
MOTION FOR DETERMINATION THAT AUTOMATIC STAY DOES NOT APPLY TO
THEIR LAWSUIT AGAINST TOBY NEUGEBAUER OR, IN THE ALTERNATIVE,
FOR RELIEF FROM THE AUTOMATIC STAY**

Plaintiffs Seven Talents, LLC, Rhythmic Capital Fund II, LLC, and J.I.G., LLC (collectively, “Plaintiffs”) hereby file this Witness and Exhibit List containing the exhibits that Plaintiffs intend to or may offer, and the witnesses Plaintiffs may call, during the hearing on *Seven Talents, LLC’s, Rhythmic Capital Fund II, LLC’s, and J.I.G., LLC’s Motion for Determination that Automatic Stay Does Not Apply to Their Lawsuit Against Toby Neugebauer or, in the Alternative, for Relief from the Automatic Stay* [Docket No. 87] (the “Motion”).

EXHIBITS

- A. Plaintiffs' Original Petition (Dkt. No. 87-1).
- B. Proposed Plaintiffs' First Amended Petition (Dkt. No. 87-2).

WITNESSES

Plaintiffs do not currently anticipate calling any witnesses during the hearing. However, Plaintiffs reserve the right to call as witnesses (i) any persons who are disclosed by any other party as potential witnesses, or (ii) any person with relevant knowledge who is present in the courthouse during the hearing.

Plaintiffs reserve the right to supplement this Witness and Exhibit List.

Respectfully submitted,

/s/ Chase J. Potter _____

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This certifies that a true and correct copy of the above and foregoing instrument is being served on the individuals listed below via the Court's ECF system:

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/s/ Chase J. Potter _____

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